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April 29, 2025

VIA EMAIL: njdnef Williams@njd.uscourts.gov

The Honorable Judge Karen M. Williams **United States District Court** District of New Jersey Camden Vicinage

Re: Kevin Gill v. Game Changer Wrestling, LLC, et al.

USDC for the District of New Jersey, Civil No. 24-10650 (KMW/AMD)

Dear Judge Williams:

My office represents Plaintiff Kevin Gill ("Plaintiff" or "Mr. Gill") in the above referenced matter and I write jointly on behalf of Plaintiff and Defendants Game Changer Wrestling, LLC ("GCW") and Brett Hoffman ("Mr. Hoffman") (collectively the "Defendants"). On April 22, 2025, counsel for Plaintiff conferred with counsel for Defendants via phone conference pursuant to L. Civ. R. 26.1(b)(2) and 26.1(d) concerning discovery of electronically stored information, including social media, and the parties have agreed on computer-based discovery matters. Specifically, images of electronic documents will be produced in the first instance, with each party entitled to demand native files with metadata upon a showing of materiality and proportionality.

Sincerely,

KAMINSKY LAW, LLC

cc: Sarah Sulkowski via email Zachary Gelber via email